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9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 INNOVATIV MEDIA GROUP, INC.; TTP8,  
13 LLC

14 Case Number:  
15 2:22-cv-001184-JCM-EJY

16 (Consolidated with Case No. 2:22-cv-01362)

17 MICHAEL BEYS; RICHARD DE SILVA;  
LATERAL U.S. OPPORTUNITIES FUND  
AI, L.P.; LATERAL U.S. CREDIT  
OPPORTUNITIES FUND QP, L.P.;  
LATERAL CREDIT OPPORTUNITIES,  
LLC; LATERAL INVESTMENT  
MANAGEMENT, LLC; LATERAL FTE  
FEEDER, LLC; LATERAL JUSCOM  
FEEDER, LLC; FTE NETWORKS, INC.

18 **STIPULATION AND ORDER**  
**EXTENDING BRIEFING DEADLINES**  
**FOR DEFENDANTS' MOTION TO**  
**DISMISS [ECF NO. 93]**

19 **(FIRST REQUEST)**

20 Defendant.

21 Plaintiffs Innovativ Media Group, Inc. ("Innovativ") and TTP8, LLC ("TTP8") (and  
22 collectively, "Plaintiffs"), and Defendants Michael Beys, Richard De Silver, Lateral U.S.  
23 Opportunities Fund AI, L.P., Later U.S. Credit Opportunities Fund OP, L.P., Lateral Credit  
24 Opportunities, LLC, Lateral Investment Management, LLC Lateral FTE Feeding, LLC,  
Lateral Justcom Feeder, LLC and FET Networks, Inc. ("Defendants") (collectively "the  
25 Parties") by and through their respective counsels of record, hereby stipulate and agree and  
jointly request as follows:

26 1. On December 6, 2023, Defendants filed [ECF No. 93] their Renewed Motion  
27 to Dismiss, or in the Alternative for Summary Judgment as to Original Claims in Case No.  
28

1 2:22-cv-01184 Pleaded in Amended Complaint (ECF 34) and their Renewed Motion to  
2 Dismiss Innovativ's Claims in Consolidated Case No. 2:220cv001362-CDS-VCF, Amended  
3 Complaint (ECF 52).

4       2. Plaintiffs' opposition is due December 20, 2023, and a reply would be due  
5 December 27, 2023.

6       3. The Parties jointly request, stipulate, and agree to modify the existing  
7 deadlines as follows:

8           a. Plaintiffs' deadline to file a response to Defendants' Motion [ECF No.  
9 93] shall be extended to **February 2, 2024**; and

10           b. Defendants' deadline to file reply to their Motion shall be extended to  
11 **February 16, 2024**.

12 Dated this 20th day of December, 2023

Dated this 20th day of December, 2023

13 **MARQUIS AURBACH**

**LEX DOMUS LAW**

14 By:/s/*Alexander K. Calaway*

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28 Attorneys for Defendants

**ORDER**

20 DATED: December 22, 2023.

22   
23 Lewis C. Mahan  
24 UNITED STATES DISTRICT JUDGE